

EXHIBIT C

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Exhibit C – Timeline Summary of Meet and Confer

Date	Event
7/11/23	Moog sent Skyryse a list of software-focused search terms to be run across Skyryse’s Google Drive, Polarion, and Git repositories. Moog also proposed specific searching criteria. (Ex. B at 39-42.)
7/14/23	<p>The Parties telephonically met and conferred.</p> <ul style="list-style-type: none">• Regarding Moog’s proposed search terms, Skyryse indicated that it would likely object to some of Moog’s proposed search terms, but that Skyryse was generating search term hit reports and would provide them to Moog.• Regarding Skyryse’s Google Drive repository, Skyryse advised that its Google Drive environment is not folder based, and is instead based on “tags.” Skyryse further advised for the first time that the vast majority of standard metadata fields are not searchable within the Google Drive environment. Skyryse proposed that it run Moog’s search terms across Google Drive without metadata searching. <p>(Ex. B at 37.)</p>
7/20/23	Moog sent a spreadsheet to Skyryse with additional search terms targeted towards other types of files and data like those related to hardware and electronics. (Ex. B at 36.)
7/26/23	<p>The Parties telephonically met and conferred:</p> <ul style="list-style-type: none">• Regarding Google Drive, Moog explained that searching

	<p>metadata within Google Drive documents is important, necessary, and is contemplated by Court's order granting in part Moog's Motion to Enforce. Moog proposed that Skyryse process its entire Google Drive account so that metadata can be searchable. Skyryse objected to this proposal based on burden, including cost for processing and hosting such data. Skyryse estimated these costs to be approximately \$136,000 to process the entire Google drive and approximately \$100,000 in hosting fees. To reach a compromise, Moog proposed that Skyryse exclude portions of its Google Drive that would be processed and that Skyryse identify portions of its Google Drive that it contends are not relevant and should not be processed.</p> <ul style="list-style-type: none">• Moog requested that by July 28, Skyryse provide search term hit reports for Moog's proposed search terms and identification of search terms that Skyryse objected to.• At Skyryse's request, Moog agreed to a one-week continuance of the Court's July 31 deadline to agree on search terms, and the Parties filed a stipulation to that effect. (Dkt. 588.) <p>(Ex. B at 30-33.)</p>
7/31/23	<p>Regarding Google Drive, Skyryse advised that it is unable to isolate Google Drive folders that were accessed by Hummingbird personnel, former Moog employees, and other individuals identified in Moog's Motion to Enforce. Skyryse</p>

	<p>indicated that it was looking into whether it could narrow the set of Google Drive data to be processed before search terms are applied. (Ex. B at 27-29.)</p>
8/1/23	<ul style="list-style-type: none">• Regarding Google Drive, Skyrise advised that it is still working with FTI to determine if it can narrow portions of Google Drive that certain individuals had permission to access.• Regarding Moog's proposed search terms, Skyrise identified for the first time the 15 search terms it objected to. Notably, only one of these search terms had a volume of unique hits over 2,285 documents. <p>(Ex. B at 23-25.)</p>
8/2/23	<p>The Parties telephonically met and conferred.</p> <ul style="list-style-type: none">• Regarding Google Drive, Moog requested more information on how access is restricted to documents within Google Drive, including whether there is an administrator that controls or has access to that information.• Regarding the search terms, Skyrise agreed to identify any additional search terms it objected to, along with hit counts. <p>(Ex. B at 22-23.)</p>
8/3/23	<p>Regarding search terms, Moog pointed out that none of the unique hit counts presented an undue burden to Skyrise, but proposed that the Skyrise run searches for "Platform" using a capital "P," and then let Moog know the resulting unique hits.</p>

	(Ex. B at 21.)
8/3/23	Skyryse advised that the hit counts it provided on 8/1/23 were incomplete, and provided revised hit counts for Google Drive and Git for 21 of Moog’s proposed search terms that Skyryse objected to. However, Skyryse’s hit counts did not include unique hits. (Ex. B at 18-20.)
8/4/23	Moog advised Skyryse that its search term hit counts are incomplete because they do not provide “unique hits” which is what is actually necessary for us to evaluate any burden on Skyryse to review documents associated with a particular search term. (Ex. B at 16-18.)
8/4/23	Skyryse provided updated hit counts for Google Drive and Git for the 21 search terms it objected to. However, Skyryse only provides unique hits for Google Drive, and contends that it is unable to provide unique hits within Git. (Ex. B at 14-16.)
8/4/23	<p>The Parties met and conferred telephonically.</p> <ul style="list-style-type: none"> • Skyryse agreed to identify the particular burdens involved in targeting particular shared drives accessed by the individuals at issue. • Moog requested that Skyryse identify unique hit counts for all search terms and for all repositories in aggregate. • Moog agreed to drop the search term “Git” from Skyryse’s Git repositories. <p>(Ex. B at 12-13.)</p>
8/7/23	<ul style="list-style-type: none"> • Skyryse advised that “limiting the collection of Google Drive to only those shared drives to which the named

	<p>people had access will meaningfully reduce the burden or cost of processing and searching the drive.” Skyrise maintains its proposal that it run Moog’s search terms in Google Drive without any metadata searching.</p> <ul style="list-style-type: none">• Skyrise objected to Moog’s proposed search terms of “Git,” “Jira” and “Platform” with a capital “P.” <p>(Ex. B at 10-11.)</p>
8/8/23	<ul style="list-style-type: none">• Regarding Google Drive, Moog requested that Skyrise identify what tool its vendor is using to process data, as one of the available tools (Google Takeout) would allow for metadata searching. Moog further requested production of log files for each individual at issue. Finally, Moog advised that its understanding is that FTI can ingest entire repositories, run search terms, and process only search term hits without processing the entire repository (thereby contradicting Skyrise’s position that it would need to host the entirety of its Google Drive in order to search for metadata).• Moog explained why Skyrise’s objections to the search term “Platform” lacked merit given the size and circumstance of this case. Moog agreed to replace “Jira” with (“Jira” and “guide”) and “Git” with (“Git” and “guide”), and to drop “platform” from Git.• Moog’s counsel proposes a 3:00 PM PT exchange deadline on August 11 for the Parties’ joint submission, noting that he has a commitment later that afternoon.

	(Ex. B at 7-10.)
8/9/23	<ul style="list-style-type: none">• Skyrise maintained its position that for Google Drive, Moog's search terms be run without any metadata searching.• Skyrise claimed it cannot identify unique hit counts for Git.• Skyrise objected to Moog's proposed search terms based on aggregate documents, which Skyrise contended is 161,101 files.• Skyrise agrees to a mutual exchange deadline of 3:00 PM PT on August 11 for the Parties' joint submission. <p>(Ex. B at 6-7.)</p>
8/10/11	<ul style="list-style-type: none">• Skyrise disclosed for the first time that its Google Drive contains a total of 9.48 TB of data.• Skyrise did not dispute that using Google Takeout would provide JSON files which contain metadata, but contended that FTI would need to create a "custom system to parse and index those files." Moog suggested using Google Takeout to extract the Google Drive data, and then using another tool to process and search the data. Moog also suggested searching the JSON files as searchable text files. Skyrise indicated it would look into these issues.• Skyrise contended that FTI's ECA model would not reduce any processing/hosting fees.• Skyrise did not provide any updated hit count

	<p>information, both in aggregate and for the revised search terms, as requested by Moog.</p> <p>(Ex. B at 3-4.)</p>
8/11/23	<ul style="list-style-type: none">• Skyrise provided updated hit count information• The total number of “unique” hits in Google Drive for the “Platform” search term is 8 documents.• Skyrise represents that the total number of documents it would need to review based on Moog’s revised search terms is approximately 113,000 documents. <p>(Ex. B at 2-3.)</p>
8/11/23	<p>At 2:36 PM, 24 minutes before the agreed-upon exchange deadline, Skyrise demands pushing the deadline back to 6:00 PM PT. Moog’s counsel notes the unprofessionalism of Skyrise’s repeated conduct with respect to joint filings, and agrees to a 5:00 PM PT exchange deadline.</p>